

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WEATHERFORD TECHNOLOGY  
HOLDINGS, LLC and WEATHERFORD  
U.S., L.P.,

*Plaintiffs,*

v.

TESCO CORPORATION, TESCO  
CORPORATION (US), AND TESCO  
OFFSHORE SERVICES, INC.

*Defendants.*

CIVIL ACTION NO. 2:17-cv-00456-JRG

JURY TRIAL DEMANDED

**DEFENDANT TESCO'S SUBMISSION OF PROPOSED FINAL JURY MATERIALS**

Defendant Tesco respectfully submits its proposed final materials for the jury. Attached as Exhibit A is Tesco's proposed final jury instructions and attached as Exhibit B is Tesco's proposed jury verdict form. Tesco further encloses as Exhibits C – H the materials Tesco relied on to create its proposed final jury instructions.<sup>1</sup>

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<sup>1</sup>These exhibits are: Exhibit C – FCBA Model Jury Charge; Exhibit D – Honorable Judge Gilstrap's Final Jury Instructions in Case No. 2:17-cv-123 (August 25, 2018), Exhibit E – Honorable Judge Gilstrap's Jury Charge in Case No. 2:15-cv-351 (March 24, 2017)(excerpts), Exhibit F – Honorable Judge Gilstrap's Jury Charge in Case No. 2:15-cv-1528 (March 10, 2017)(excerpts), Exhibit F – Honorable Judge Gilstrap's Jury Charge in Case No. 2:15-cv-1528 (March 10, 2017)(excerpts), Exhibit G – Honorable Judge Gilstrap's Jury Charge in Case No. 2:13-cv-1015 (June 9, 2017)(excerpts); and Exhibit H - Honorable Judge Gilstrap's Jury Charge in Case No. 6:12-cv-100 (March 16, 2015)(excerpts).

Date: December 4, 2018

Respectfully submitted,

**RALEY & BOWICK, LLP**

/s/ John Wesley Raley

John Wesley Raley (lead counsel)

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**ATTORNEYS FOR DEFENDANTS**

**TESCO CORPORATION,**

**TESCO CORPORATION (US), AND**

**TESCO OFFSHORE SERVICES, INC.**

### **CERTIFICATE OF SERVICE**

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on December 4, 2018. Any other counsel of record who has not consented to electric service will be served via facsimile transmission and/or first class certified mail, return receipt requested.

/s/ Robert M. Bowick

**Robert M. Bowick**